

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|  |   |                       |
|--|---|-----------------------|
| DRAMETTA TODD,                         | ) |                       |
| individually and on behalf of a class, | ) |                       |
|  | ) |                       |
| Plaintiff,                             | ) | 10 CV 5598            |
|  | ) |                       |
| v.                                     | ) | Judge Bucklo          |
|  | ) | Magistrate Judge Keys |
| TARGET CORPORATION,                    | ) |                       |
|  | ) |                       |
| Defendant.                             | ) |                       |

**STIPULATION REGARDING MOTION FOR CLASS CERTIFICATION**

Defendant Target Corporation stipulates that, until such time as Plaintiff, Drametta Todd, moves for class certification, it will not make any offer or tender to Plaintiff, including but not limited to an offer pursuant to Fed. R. Civ. P. 68, that would have the effect of mooted Plaintiff's claims in this matter on behalf of the putative class defined in the Complaint. Nothing in this Stipulation precludes Defendant Target Corporation from making an offer to Plaintiff pursuant to Fed. R. Civ. P. 68 on a class basis. In consideration of the foregoing, Plaintiff stipulates to withdraw the pending motion for class certification without prejudice.

**DRAMETTA TODD**

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One of Her Attorneys

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**TARGET CORPORATION**

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**CERTIFICATE OF SERVICE**

I, Francis R. Greene, hereby certify that on September 22, 2010, I caused to be filed the foregoing documents with the Clerk of the Court using the CM/ECF System and that I caused to be sent a true and accurate copy of such filing via electronic mail to the following parties:

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